

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

PLAINTIFFS’ MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Civil Rule 5(C) and the Modified Protective Order (Dkt. 203), Plaintiffs respectfully move this Court to seal Appendix A and Exhibits 4 and 6–11 to Plaintiffs’ Memorandum of Law in Support of Plaintiffs’ Motion to Enforce the Court’s May 30 Order and to Compel Production of Google’s Remedy Feasibility Submissions to the European Commission, as well as the portions of the Memorandum of Law that reference sealed exhibits. The documents or portions of documents that Plaintiffs seek to seal contain material Defendant Google has designated as confidential or highly confidential. Consistent with the local rule and this Court’s Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled “UNDER SEAL.” The grounds for this motion are contained in the accompanying memorandum of law. A proposed order is attached for the Court’s convenience.

Dated: June 13, 2025

Respectfully submitted,

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